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Attorneys for Dugaboy Investment Trust

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.

Reorganized Debtor.

\$
Chapter 11

Case No. 19-34054-sgj-11

\$
Reorganized Debtor.

## MOTION OF DUGABOY INVESTMENT TRUST FOR SUBSTITUTION OF COUNSEL

COMES NOW, The Dugaboy Investment Trust ("Dugaboy"), and files this Motion for Substitution of Counsel ("Motion"), and in support thereof, respectfully states as follows:

- 1. On June 6, 2025, Dugaboy requested Hunton Andrews Kurth ("Hunton") to represent it with respect to the limited matter of the Highland Entities' Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 and 11 U.S.C. §363 Approving Settlement with the HMIT Entities and Authorizing Actions Consistent Therewith (the "9019 Motion").
- 2. Pursuant to the notices of hearing on the 9019 Motion, the deadline for objections was Monday, June 9, 2025. Hunton filed a Motion to Extend the Deadline (the "Motion to Extend") and an Objection to the 9019 Motion. In their objection to the Motion to Extend, the Highland Entities asserted, *inter alia*, that Hunton has a conflict of interest.

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3. Rather than burden the Court and parties with the time, expense, and distraction of

a conflict dispute, Dugaboy requests the Court authorize (a) Hunton to withdraw its limited

appearance as counsel for the specified matter identified above, and (b) the law firm of Crawford,

Wishnew & Lang, PLLC to substitute as its counsel for the specified matter identified above.

WHEREFORE, PREMISES CONSIDERED, Dugaboy requests the Court enter an

order authorizing (a) Hunton to withdraw its limited appearance as counsel for the specified matter

identified above, and (b) the law firm of Crawford, Wishnew & Lang, PLLC to substitute as its

counsel for the specified matter identified above.

Dated: June 13, 2025.

Respectfully submitted,

CRAWFORD, WISHNEW & LANG PLLC

By: /s/ Michael J. Lang

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**CERTIFICATE OF SERVICE** 

The undersigned hereby certifies that on this 13<sup>th</sup> day of June, 2025, a true and correct copy of the foregoing was served on ECF participants, electronically through the Court's ECF System.

By: /s/ Michael J. Lang

Michael J. Lang

## **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that, on the 12<sup>h</sup> day of June, 2025, I conferred with Jeff Pomerantz and Greg Demo, Counsel to Highland Capital Management, L.P. and the Highland Claimant Trust and they consent to the relief requested in this Motion.

/s/ Gregory G. Hesse Gregory G. Hesse